



ABRAHAM MAZLOUMI  
& ASSOCIATES  
ATTORNEYS AT LAW

June 29, 2023

**Abraham S. Mazloumi, Esq.\***

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*\*Also admitted in New Jersey*

Hon. Eric Komitee  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Via ECF**

Re: *Dickerson v. Dickerson et al*  
Case No. 1:23-cv-03859

Dear Judge Komitee:

I am writing to you in response to Robert L. Dickerson's outrageous letter dated June 25, 2023.

I do not take lightly writing this letter to you, as I am conscious of Your Honor's busy schedule. However, Robert L. Dickerson's letter not only contains knowingly-false information and misrepresentations, it is at this point purely defamatory.

I have not "kidnaped [sic]" Brandon Dickerson, nor have I done or said anything that could *possibly* cause Robert L. Dickerson to "fear for [his] life" or to think that I want to "end [his] life."

What I did do on June 26, 2023 was to approve the discharge of Brandon Dickerson from North Shore LIJ Hospital, where Brandon Dickerson had been staying for the past approximately 2 months (in connection with a necessary medical procedure), to Queens Nassau Rehabilitation & Nursing Center,<sup>1</sup> a "Traumatic Brain Injury (TBI)-certified" facility.

The decision to transfer Brandon Dickerson to Queens Nassau Rehabilitation was based on the availability of facilities willing to accept Brandon Dickerson, as reported to me by the hospital's

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<sup>1</sup> This is the very facility to which Robert L. Dickerson himself had (prior to my appointment) transferred Brandon Dickerson from Louisiana because of that facility's TBI program, and where Brandon Dickerson stayed for approximately 12 months until he was transferred to the hospital this past April for a necessary medical procedure.

discharge planner. Furthermore, the attached court order required me to use every effort to identify a TBI-certified facility (which Queens Nassau Rehabilitation is).

Perhaps more importantly, Robert L. Dickerson is well-aware of all of the facts leading up to Brandon Dickerson's discharge from the hospital to Queens Nassau Rehabilitation -- in part because the two long-term care facilities that Robert L. Dickerson had selected (*and which facilities were contacted by the hospital's discharge planner, at my request out of respect to Robert L. Dickerson wishes*) ultimately declined to accept Brandon Dickerson. See a copy of the attached email from the hospital's discharge planner concerning one of the facilities, and which email I had forwarded to Robert L. Dickerson.

I understand that Robert L. Dickerson is upset that I was appointed as temporary guardian, and that (for idiosyncratic reasons) he did not want Brandon Dickerson to return to Queens Nassau Rehabilitation.

But with his letter to Your Honor, Robert L. Dickerson has crossed a line by making willful misrepresentations and defamatory accusations, and I respectfully ask Your Honor to view Robert L. Dickerson's letter in that light.

Respectfully submitted,

/s/ Abraham S. Mazloumi  
Abraham S. Mazloumi, Esq.

Attachments

cc: Hon. Bernice D. Siegal (via Regular mail)  
Robert L. Dickerson (via Regular mail)

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**Brasond Dickerson: Brookside Multicare Center.**

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**Abraham S. Mazloumi, Esq.** <abraham@mazloumi.com>

Fri, Jun 23, 2023 at 6:55 PM

To: robert dickerson <roblawdickerson@gmail.com>

Dear Mr. Dickerson,

For your information, please see the attached email from the hospital social worker re Brookside Multicare Center.

I have no idea why they declined to accept Brandon, but you can of course call them to find out.

Abraham Mazloumi

--

Abraham S. Mazloumi, Esq.\*

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**Email from hospital social worker re Brookside Multicare \_ Dickerson 6-23-23.pdf**

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**PHI**

From: Petrone, Saima  
To: abraham@mazloumi.com  
Cc:  
Sent: 6/23/2023 2:18:15 PM

Hi Abraham,

At your request, I send a referral to Brookside Multicare Nursing Center. I received a call from Jennifer Asciolla at admissions who informed me that unfortunately they cannot accept Brandon.

*Saima Petrone, LCSW*

North Shore University Hospital  
Department of Social Work  
300 Community Drive  
Manhasset, NY 11030  
Phone: 516-562-3011



At IAS Part 8G of the Supreme Court of the State of New York, held in and for the County of Queens, at the Court House located at 88-11 Sutphin Blvd, Jamaica, New York 11435 on the 23rd day of June, 2023.

P R E S E N T: HON. BERNICE D. SIEGAL  
Honorable Justice of the Supreme Court

-----X  
In the Matter of the Application of  
**GENEVA DICKERSON**  
Petitioner,  
for the appointment of a Guardian of the Person and  
Property of  
**BRANDON DICKERSON**,  
A Person Alleged to be Incapacitated  
-----X

Index No.: 724394/2022

**ORDER CONCERNING**  
**DISCHARGE FROM**  
**HOSPITAL**

By Orders of this Court dated February 14, 2023, this Court appointed Abraham S. Mazloui, Esq. as Successor Temporary Guardian, and upon application of Abraham S. Mazloui, Esq. dated April 19, 2023, this Court issued an Order dated April 28, 2023, *inter alia* confirming his authority to consent or refuse generally accepted routine medical or dental treatment of Brandon Dickerson, and ratifying his previous exercise of this authority; and upon application of Abraham S. Mazloui, Esq., (temporary Guardian) the temporary guardian's this Court issued an Order dated May 26, 2023, confirming ~~XXXXXX's~~ exclusive authority to discharge Brandon Dickerson from North Shore University Hospital to any medical or nursing facility;

the successor temporary Guardian

And by email dated June 21, 2023, ~~Abraham S. Mazloui, Esq.~~ having advised the Court and the parties that Brandon Dickerson is ready for discharge from North Shore University Hospital, and that of the seven 'TBI certified' facilities the hospital had contacted, only two had accepted Brandon Dickerson, namely Park Terrace Care Center, in Rego Park, and his admitting facility, Queens Nassau Nursing Home; and because Robert Dickerson is opposing Brandon Dickerson's return to Queens Nassau Nursing Home, ~~indeed~~ <sup>or admission</sup> ~~indeed~~ <sup>Successor Temporary Guardian</sup> ~~XXXXXX~~ now seeks this Court's

direction;

NOW upon the June 22, 2023 oral application of Abraham S. Mazloumi, Esq., Successor Temporary Guardian of Brandon Dickerson, it is hereby

JS  
J.S.C. ORDERED, that the Successor Temporary Guardian, Abraham S. Mazloumi, Esq., is hereby to effectuate a safe discharge from the hospital, within the County of Queens, directed to admit Brandon Dickerson to a TBI-certified facility to the extent a bed is available; and in

the absence of such availability Abraham S. Mazloumi, Esq., is hereby directed to admit Brandon Dickerson to another appropriate facility, provided that the facility shall be in the County of Queens.

ORDERED, that the petitioner shall serve this order within three days of the signed order.

This matter is adjourned to an in-person  
all day hearing August 21, 2023 at 9:30am.

ENTER:

Bernice Siegal

HON. BERNICE D. SIEGAL

